

EXHIBIT F

Steve W. Berman (*pro hac vice*)
 Craig R. Spiegel (SBN 122000)
 Emilee N. Sisco (*pro hac vice*)
 HAGENS BERMAN SOBOL SHAPIRO LLP
 1918 Eighth Avenue, Suite 3300
 Seattle, WA 98101
 Telephone: (206) 623-7292
 Facsimile: (206) 623-0594
 steveb@hbsslaw.com
 craigs@hbsslaw.com
 emilees@hbsslaw.com

Jeff D. Friedman (SBN 173886)
 HAGENS BERMAN SOBOL SHAPIRO LLP
 715 Hearst Avenue, Suite 202
 Berkeley, CA 94710
 Telephone: (510) 725-3000
 Facsimile: (510) 725-3001
 jefff@hbsslaw.com

Bruce L. Simon (SBN 96241)
 Benjamin E. Shiftan (SBN 265767)
 PEARSON, SIMON & WARSHAW, LLP
 350 Sansome Street, Suite 680
 San Francisco, CA 94104
 Telephone: (415) 433-9000
 Facsimile: (415) 433-9008
 bsimon@pswlaw.com
 bshiftan@pswlaw.com

*Class Counsel for Jenkins and Consolidated
 Action Plaintiffs*

[Additional counsel listed on signature page]

Jeffrey L. Kessler (*pro hac vice*)
 David G. Feher (*pro hac vice*)
 David L. Greenspan (*pro hac vice*)
 Joseph A. Litman (*pro hac vice*)
 WINSTON & STRAWN LLP
 200 Park Avenue
 New York, NY 10166-4193
 Telephone: (212) 294-6700
 Facsimile: (212) 294-4700
 jkessler@winston.com
 dfeher@winston.com
 dgreenspan@winston.com
 jlitman@winston.com

Sean D. Meenan (SBN 260466)
 Jeanifer E. Parsigian (SBN 289001)
 WINSTON & STRAWN LLP
 101 California Street
 San Francisco, CA 94111
 Telephone: (415) 591-1000
 Facsimile: (415) 591-1400
 smeenan@winston.com
 jparsigian@winston.com

*Class Counsel for Jenkins and Consolidated
 Action Plaintiffs*

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

IN RE: NATIONAL COLLEGIATE
 ATHLETIC ASSOCIATION ATHLETIC
 GRANT-IN-AID CAP ANTITRUST
 LITIGATION

**Case Nos. 4:14-md-2541-CW (NC)
 4:14-cv-02758-CW (NC)**

**STIPULATION AND [PROPOSED] ORDER
 REGARDING FOURTH ADDENDUM TO
 STIPULATED PROTECTIVE ORDER**

This Document Relates to:
 ALL ACTIONS

1 All parties, by their respective counsel, hereby agree and stipulate to this proposed Fourth
2 Addendum to the “Stipulated Protective Order Regarding Confidentiality of Documents and
3 Materials” (the “Protective Order”) (Dkt. 189) entered by the Court on January 15, 2015:

4 1. Unless otherwise defined herein, all capitalized terms shall have the meanings ascribed
5 to such terms in the Protective Order.

6 **ORDER REGARDING PRODUCTION OF BILLING RECORDS**

7 2. On August 21, 2019, the Court held a hearing on the following motions: Plaintiffs’
8 Motion for Attorney Fees, Expenses and Service Awards (Dkt. 1169) (“Plaintiffs’ Motion for Fees and
9 Costs”); Joint Statement of Discovery Dispute Regarding Plaintiffs’ Motion for Attorney Fees (Dkt.
10 1184) (the “Discovery Dispute”); Motion for Review of Clerk’s Taxation of Costs (Dkt. 1193); and
11 Administrative Motion to Vacate Taxed Costs Order (Dkt. 1194).

12 3. As to the Discovery Dispute (Dkt. 1184), the Court ordered Plaintiffs to produce the
13 billing records underlying Plaintiffs’ Motion for Fees and Costs to enable Defendants to review time
14 entries for tasks, if any, that Defendants contend are non-compensable, and not for any other purpose.¹

15 4. The Court did not compel waiver of privilege and ordered the parties to meet and confer
16 regarding a protective order.

17 **ADDITIONAL CATEGORY OF PROTECTED INFORMATION**

18 5. The Protective Order will recognize a new category of discovery called “Highly
19 Confidential Billing Records – Outside Counsel Only.” Any party or non-party may designate as
20 “Highly Confidential Billing Records – Outside Counsel Only” any document, production, filing, or
21 anything else furnished during the course of these actions that includes or concerns information in any
22 party or non-party’s billing records (by stating on the first page or in an accompanying letter that it is
23 “Highly Confidential Billing Records – Outside Counsel Only”). Highly Confidential Billing Records
24 – Outside Counsel Only Information may be disclosed only to those persons set forth in Paragraph 6
25 below.

26
27 ¹ The parties reserve all rights with respect to potential disputes related to (1) the scope of challenges
28 Defendants are permitted to make; and (2) the production of expense reports.

PERMISSIBLE DISCLOSURES AND USES OF INFORMATION

6. Highly Confidential Billing Records – Outside Counsel Only Information (that is designated as such in accordance with the terms of the Protective Order and this Fourth Addendum) shall not be disclosed or used, except to the following persons, and then only to the extent necessary to litigate Plaintiffs' Motion for Fees and Costs:

a. Defendants' outside litigation counsel of record, including lawyers and other members and employees of those law firms assisting with litigation-related tasks in this case;

b. The Court, court personnel and court reporters; and

c. Persons or entities that provide litigation support services (e.g., photocopying; videotaping; translating; preparing exhibits or demonstrations; organizing, storing, retrieving data in any form or medium; etc.) and their employees and subcontractors, provided that such persons or entities shall execute a copy of the certification annexed to this Addendum as Exhibit A before being shown or given any Highly Confidential Billing Records – Outside Counsel Only Information.

FILING DOCUMENTS UNDER SEAL

7. No Highly Confidential Billing Records – Outside Counsel Only Information shall be filed in the public record without either the written permission of Plaintiffs' counsel or a court order denying an Administrative Motion to File Under Seal such Highly Confidential Billing Records – Outside Counsel Only Information, provided that in the event any Administrative Motion to file Under Seal such Highly Confidential Billing Records – Outside Counsel Only Information is denied, the Plaintiffs and the filing party agree to meet and confer within three (3) calendar days to discuss in good faith alternatives to filing the Highly Confidential Billing Records – Outside Counsel Only Information on the public record. Plaintiffs preserve their rights to seek a writ of mandamus from the Ninth Circuit and/or a stay of any order denying an Administrative Motion to File Under Seal. The parties shall otherwise comply with the applicable court rules (e.g., N.D. Cal. Civil L.R. 79-5) regarding filing of documents under seal. Copies of any pleading, brief, or other document containing Highly Confidential Billing Records – Outside Counsel Only Information which is served on opposing counsel shall be stamped "HIGHLY CONFIDENTIAL BILLING RECORDS – OUTSIDE COUNSEL ONLY

1 INFORMATION PURSUANT TO PROTECTIVE ORDER”, shall be transmitted via email or cover
 2 letter and envelope bearing similar designation, and shall be treated in accordance with the provisions
 3 of the Protective Order, as amended. Defendants agree not to oppose a motion to seal Highly
 4 Confidential Billing Records – Outside Counsel Only Information.

5 **NO WAIVER**

6 8. While Plaintiffs reserve the right to redact billing records and Defendants reserve the
 7 right to challenge Plaintiffs’ redaction of such records, the production of billing records, regardless of
 8 content, shall not be deemed to waive any applicable privilege or work product protection or to affect
 9 the ability of a party to seek relief for an inadvertent disclosure of material protected by privilege or
 10 work product protection. Pursuant to the Court’s authority under Federal Rule of Evidence 502 and
 11 any other applicable law, rule, or legal principal, the inadvertent production of documents or
 12 information subject to the attorney-client privilege or work-product immunity shall not waive the
 13 privilege or immunity if a request for the return of such documents or information is made promptly
 14 after the Disclosing Party learns of its inadvertent production.

15 **INCORPORATION OF PROTECTIVE ORDER**

16 9. Except as set forth herein, for purposes of all Paragraphs of the Protective Order except
 17 Paragraph 13, Highly Confidential Billing Records – Outside Counsel Only Information will receive
 18 the same treatment under each such Paragraph as Highly Confidential – Counsel Only Information.

19 10. Except as set forth herein, any challenges or objections concerning the designation of
 20 information as Highly Confidential Billing Records – Outside Counsel Only Information shall be made
 21 pursuant to the procedures set forth in Paragraph 14 of the Protective Order.

22 11. Except as set forth herein, the Protective Order, including but not limited to all
 23 provisions related to the nondisclosure of protected information, and the return or destruction of
 24 protected information after the final termination of the litigation, are expressly incorporated into this
 25 Fourth Addendum and remain in full force and effect.

26 IT IS SO STIPULATED.

1 Dated: September 13, 2019

Respectfully submitted,

2 HAGENS BERMAN SOBOL SHAPIRO LLP

WINSTON & STRAWN LLP

3 By /s/ Steve W. Berman
4 STEVE W. BERMAN (*pro hac vice*)

By /s/ Jeffrey L. Kessler
JEFFREY L. KESSLER (*pro hac vice*)

5 Craig R. Spiegel (SBN 122000)
6 Emilee N. Sisco (*pro hac vice*)
7 1918 Eighth Avenue, Suite 3300
8 Seattle, WA 98101
9 Telephone: (206) 623-7292
10 Facsimile: (206) 623-0594
11 *steveb@hbsslaw.com*
12 *craigs@hbsslaw.com*
13 *emilees@hbsslaw.com*

David G. Feher (*pro hac vice*)
David L. Greenspan (*pro hac vice*)
Joseph A. Litman (*pro hac vice*)
200 Park Avenue
New York, NY 10166-4193
Telephone: (212) 294-6700
Facsimile: (212) 294-4700
jkessler@winston.com
dfeher@winston.com
dgreenspan@winston.com
jlitman@winston.com

14 Jeff D. Friedman (SBN 173886)
15 HAGENS BERMAN SOBOL SHAPIRO LLP
16 715 Hearst Avenue, Suite 202
17 Berkeley, CA 94710
18 Telephone: (510) 725-3000
19 Facsimile: (510) 725-3001
20 *jefff@hbsslaw.com*

Sean D. Meenan (SBN 260466)
Jeanifer E. Parsigian (SBN 289001)
WINSTON & STRAWN LLP
101 California Street
San Francisco, CA 94111
Telephone: (415) 591-1000
Facsimile: (415) 591-1400
smeenan@winston.com
jparsigian@winston.com

21 PEARSON, SIMON & WARSHAW, LLP

22 By /s/ Bruce L. Simon
23 BRUCE L. SIMON (SBN 96241)
24 Benjamin E. Shiftan (SBN 265767)
25 350 Sansome Street, Suite 680
26 San Francisco, CA 94104
27 Telephone: (415) 433-9000
28 Facsimile: (415) 433-9008
bsimon@pswlaw.com
bshiftan@pswlaw.com

*Class Counsel for Jenkins and Consolidated
Action Plaintiffs*

*Class Counsel for Jenkins and Consolidated
Action Plaintiffs*

21 By /s/ Elizabeth C. Pritzker
22 Elizabeth C. Pritzker (SBN 146267)
23 Jonathan K. Levine (SBN 220289)
24 Bethany L. Caracuzzo (SBN 190687)
25 PRITZKER LEVINE LLP
26 180 Grand Avenue, Suite 1390
27 Oakland, California 94612
28 Telephone: (415) 692-0772
Facsimile: (415) 366-6110

Additional Class Counsel

WILKINSON WALSH + ESKOVITZ LLP

By: /s/ Beth A. Wilkinson
Beth A. Wilkinson (*pro hac vice*)
Brant W. Bishop, P.C. (*pro hac vice*)
James Rosenthal (*pro hac vice*)
2001 M Street NW, 10th Floor
Washington, DC 20036
Telephone: (202) 847-4000
Facsimile: (202) 847-4005
bwilkinson@wilkinsonwalsh.com
bbishop@wilkinsonwalsh.com
jrosenthal@wilkinsonwalsh.com

Sean Eskovitz (SBN 241877)
11601 Wilshire Boulevard, Suite 600
Los Angeles, CA 90025
Telephone: (424) 316-4000
Facsimile: (202) 847-4005
seskovitz@wilkinsonwalsh.com

Attorneys for Defendant
NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION

PROSKAUER ROSE LLP

By: /s/ Bart H. Williams
Bart H. Williams (SBN 134009)
Scott P. Cooper (SBN 96905)
Kyle A. Casazza (SBN 254061)
Jennifer L. Jones (SBN 284624)
Shawn S. Ledingham, Jr. (SBN 275268)

2029 Century Park East, Suite 2400
Los Angeles, CA 90067
Telephone: (310) 557-2900
Facsimile: (310) 557-2193
scooper@proskauer.com
bwilliams@proskauer.com
kcasazza@proskauer.com
jljones@proskauer.com
sledingham@proskauer.com
jcrawley@proskauer.com

Attorneys for Defendant
PAC-12 CONFERENCE

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

By: /s/ Jeffrey A. Mishkin
Jeffrey A. Mishkin (*pro hac vice*)
Karen Hoffman Lent (*pro hac vice*)
Four Times Square
New York, NY 10036
Telephone: (212) 735-3000
Facsimile: (212) 735-2000
jeffrey.mishkin@skadden.com
karen.lent@skadden.com

Patrick Hammon (SBN 255047)
525 University Avenue, Suite 1100
Palo Alto, CA 94301
Telephone: (650) 470-4500
Facsimile: (650) 470-4570
patrick.hammon@skadden.com

Attorneys for Defendants
NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION and WESTERN
ATHLETIC CONFERENCE

MAYER BROWN LLP

By: /s/ Britt M. Miller
Andrew S. Rosenman (SBN 253764)
Britt M. Miller (*pro hac vice*)
71 South Wacker Drive
Chicago, IL 60606
Telephone: (312) 782-0600
Facsimile: (312) 701-7711
arosenman@mayerbrown.com
bmiller@mayerbrown.com

Richard J. Favretto (*pro hac vice*)
1999 K Street, N.W.
Washington, DC 20006
Telephone: (202) 263-3000
Facsimile: (202) 263-3300
rfavretto@mayerbrown.com

Attorneys for Defendant
THE BIG TEN CONFERENCE, INC.

POLSINELLI PC

By: /s/ Leane K. Capps

Leane K. Capps (*pro hac vice*)
Caitlin J. Morgan (*pro hac vice*)
2950 N. Harwood Street
Suite 2100
Dallas, TX 75201
Telephone: (214) 397-0030
lcapps@polsinelli.com
cmorgan@polsinelli.com

Amy D. Fitts (*pro hac vice*)
120 W. 12th Street
Kansas City, MO 64105
Telephone: (816) 218-1255
afitts@polsinelli.com
mwinter@polsinelli.com

Wesley D. Hurst (SBN 127564)
2049 Century Park East, Suite 2300
Los Angeles, CA 90067
Telephone: (310) 556-1801
whurst@polsinelli.com

Attorneys for Defendants
THE BIG 12 CONFERENCE, INC. and
CONFERENCE USA, INC.

ROBINSON BRADSHAW & HINSON

By: /s/ Robert W. Fuller

Robert W. Fuller, III (*pro hac vice*)
Nathan C. Chase Jr. (SBN 247526)
Lawrence C. Moore, III (*pro hac vice*)
Pearlynn G. Houck (*pro hac vice*)
Amanda R. Pickens (*pro hac vice*)
101 N. Tryon St., Suite 1900
Charlotte, NC 28246
Telephone: (704) 377-2536
Facsimile: (704) 378-4000
rfuller@rbh.com
nchase@rbh.com
lmoore@rbh.com
phouck@rbh.com
apickens@rbh.com

Mark J. Seifert (SBN 217054)
Seifert Law Firm
425 Market Street, Suite 2200
San Francisco, CA 94105
Telephone: (415) 999-0901
Facsimile: (415) 901-1123
mseifert@seifertfirm.com

Attorneys for Defendant
SOUTHEASTERN CONFERENCE

FOX ROTHSCHILD LLP

By: /s/ D. Erik Albright
D. Erik Albright (*pro hac vice*)
Gregory G. Holland (*pro hac vice*)
300 N. Greene Street, Suite 1400
Greensboro, NC 27401
Telephone: (336) 378-5200
Facsimile: (336) 378-5400
ealbright@foxrothschild.com
gholland@foxrothschild.com

Jonathan P. Heyl (*pro hac vice*)
101 N. Tryon Street, Suite 1300
Charlotte, NC 28246
Telephone: (704) 384-2600
Facsimile: (704) 384-2800
jheyhl@foxrothschild.com

Charles LaGrange Coleman, III (SBN 65496)
HOLLAND & KNIGHT LLP
50 California Street, Suite 2800
San Francisco, CA 94111-4624
Telephone: (415) 743-6970
Facsimile: (415) 743-6910
ccoleman@hklaw.com

Attorneys for Defendant
THE ATLANTIC COAST CONFERENCE

COVINGTON & BURLING LLP

By: /s/ Benjamin C. Block
Benjamin C. Block (*pro hac vice*)
One CityCenter
850 Tenth Street, N.W.
Washington, DC 20001-4956
Telephone: (202) 662-5205
Facsimile: (202) 778-5205
bblock@cov.com

Rebecca A. Jacobs (SBN 294430)
One Front Street
San Francisco, CA 94111-5356
Telephone: (415) 591-6000
Facsimile: (415) 591-6091
rjacobs@cov.com

Attorneys for Defendant
AMERICAN ATHLETIC CONFERENCE

WALTER HAVERFIELD LLP

By: /s/ R. Todd Hunt
R. Todd Hunt (*pro hac vice*)
Benjamin G. Chojnacki (*pro hac vice*)
The Tower at Erieview
1301 E. 9th Street, Suite 3500
Cleveland, OH 44114-1821
Telephone: (216) 928-2935
Facsimile: (216) 916-2372
rthunt@walterhav.com
bchojnacki@walterhav.com

Attorneys for Defendant
MID-AMERICAN CONFERENCE

BRYAN CAVE LEIGHTON PAISNER LLP

By: /s/ Meryl Macklin
Meryl Macklin (SBN 115053)
560 Mission Street, 25th Floor
San Francisco, CA 94105
Telephone: (415) 268-1981
Facsimile: (415) 430-4381
meryl.macklin@bryancave.com

Richard Young (*pro hac vice*)
Brent Rychener (*pro hac vice*)
90 South Cascade Avenue, Suite 1300
Colorado Springs, CO 80903
Telephone: (719) 473-3800
Facsimile: (719) 633-1518
richard.young@bryancave.com
brent.rychener@bryancave.com

Attorneys for Defendant
MOUNTAIN WEST CONFERENCE

JONES WALKER LLP

By: /s/ Mark A. Cunningham
Mark A. Cunningham (*pro hac vice*)
201 St. Charles Avenue
New Orleans, LA 70170-5100
Telephone: (504) 582-8536
Facsimile: (504) 589-8536
mcunningham@joneswalker.com

Attorneys for Defendant
SUN BELT CONFERENCE

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from the signatories above.

/s/ Jeffrey L. Kessler
Jeffrey L. Kessler

[PROPOSED] ORDER

PURSUANT TO THE FOREGOING STIPULATION OF THE PARTIES,

IT IS SO ORDERED.

Dated: _____

The Honorable Claudia Wilken
United States District Judge

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

In re:

NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION ATHLETIC GRANT-IN-
AID CAP ANTITRUST LITIGATION

Case No. 14-md-02541 CW (NC)
Case No. 14-cv-02758 CW (NC)

**ORDER GRANTING STIPULATION
ON FOURTH ADDENDUM TO
PROTECTIVE ORDER**

Dkt. No. 1237

For good cause shown, the Court GRANTS ECF 1237, the stipulation regarding the fourth addendum to the protective order. For purposes of clarity, this order does not modify the standards or procedural requirements for filing materials under seal under N.D. Cal. Civil Local Rule 79-5. The parties must comply with Local Rule 79-5 if they seek to file materials under seal.

IT IS SO ORDERED.

Date: September 13, 2019


Nathanael M. Cousins
United States Magistrate Judge